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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

DAVID AGUILAR,

Plaintiffs,

V.

J. TAFELMEYER, et al.,

Defendant(s).

Case No.: 3:23-cv-00547-ART-CSD

**STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE
WITH LOCAL RULE 26-1(e)**

Pursuant to the requirements of Fed. R. Civ. P. 26(f) and LR 26-1(e), the Plaintiff and Defendants hereby submit the following Stipulated Discovery Plan and Scheduling Order in the above-captioned matter.

A. Information Requested by Fed. R. Civ. P. 26(f):

1. Counsel for the parties conducted a meeting pursuant to Federal Rule of Civil Procedure 26 and Local Rule 26-1(d) on April 4, 2024. Pursuant to an agreement between the parties, the parties will serve initial disclosures in accordance with Federal Rule of Civil Procedure 26(a) on or before Monday, May 6, 2024.

2. Discovery may be conducted on all discoverable matters relevant to issues raised by the Complaint (and amendments thereto), Answer, and any subsequent

1 pleadings, consistent with the Federal Rules of Civil Procedure and the Local Rules of
2 this District.

3 3. No changes or limitations, other than those set forth below, set by either
4 the Federal Rules of Civil Procedure or Local Rules for the District of Nevada are
5 requested at this time.

6 B. Information Requested by LR 26-1(e):

7 1. Discovery Cut-Off Date:

8 Discovery will not take more than one hundred eighty (180) days from
9 April 4, 2024, which is the date of the early case conference. All discovery must be
10 completed no later than Tuesday, October 1, 2024. When producing documents
11 responsive to a discovery request, the documents shall be numbered and the responsive
12 documents shall be specifically referred to by bates-number in the response.

13 2. Amending the Pleadings and Adding Parties:

14 The date for filing motions to amend the pleadings or to add parties shall
15 not be later than ninety (90) days prior to the discovery cut-off date and, therefore, not
16 later than Wednesday, July 3, 2024. Any party causing additional parties to be joined or
17 brought to this action shall contemporaneously therewith cause a copy of this Order to
18 be served upon the new party or parties.

19 3. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):

20 The last day for disclosures required by Fed. R. Civ. P. 26(a)(2)
21 concerning experts shall be Wednesday, July 3, 2024. The last day for disclosures
22 regarding rebuttal experts shall be Friday, August 2, 2024.

23 4. Dispositive Motions:

24 The parties shall file dispositive motions not more than thirty (30) days
25 after the discovery cut-off date and, therefore, not later than Thursday, October 31, 2024.

26 5. Pretrial Order:

1 If no dispositive motions are filed, and unless otherwise ordered by this
2 Court, the Joint Pretrial Order shall be filed not more than thirty (30) days after the date
3 set for filing dispositive motions and, therefore, not later than Monday, December 2,
4 2024. In the event dispositive motions are filed, the last day to file the Joint Pretrial
5 Order shall be suspended until thirty (30) days after the ruling on the dispositive motions.

6 6. Interim Status Reports:

7 In accordance with Local Rule 26-3, an Interim Status Report will be filed
8 by the parties with the Court sixty (60) days prior to the discovery cut-off date, and
9 therefore, not later than Friday, August 2, 2024.

10 C. Additional Deadlines:

11 1. Extensions or Modifications of the Discovery Plan and Scheduling Order:

12 In accordance with Local Rule 26-4, a stipulation or motion for modification or extension
13 of this discovery plan and scheduling order must be made no later than twenty-one (21)
14 days prior to the discovery cut-off date, and therefore, not later than Tuesday, September
15 10, 2024.

16 D. Certifications

17 1. By signing below, the parties make the following certifications:

18 The parties have met and conferred about the possibility of using alternative
19 dispute-resolution processes including mediation, arbitration, and if applicable, early
20 neutral evaluation.
21

22 The parties have considered consent to trial by a magistrate judge under 28
23 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General
24 Order 2013-01).

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2 IT IS SO STIPULATED.

3 DATED this: Apr 4, 2024

4 By: /s/ Andrew Nelson, Esq.

5 Andrew Christian Nelson
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19 Attorney for Plaintiff

20 IT IS SO ORDERED.

21 
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: April 5, 2024.